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February 23, 2022

VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Insurance Company, et al. v. Starrett City Medical, P.C., et al.
Docket No.: 1:21-cv-00059-NCG-RML

Dear Magistrate Judge Levy:

I write on behalf of Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively, "Plaintiffs") and with the consent of Gary Tsirelman, Esq., counsel for Defendants Peter Khaimov a/k/a Peter Khaim and A&P Holding Group Corp. ("Defendants").

As Your Honor is aware, an agreement was reached between counsel for GEICO and counsel for the Defendants several months ago. By letter dated January 11, 2022, Plaintiffs sought a deadline for which the Defendants would need to comply with their settlement obligations. See Doc. No. 65. On January 17, 2022, Your Honor issued an Order that the Defendants shall comply with their settlement obligations and execute the agreement by February 18, 2022 or show cause why they have not done so.

At this time, counsel for Defendants are working with their client to comply and thus we are requesting the Court extend Defendants time to comply with their settlement obligations until February 28, 2022.

The Court's continuing attention to this matter is appreciated.

Respectfully submitted,

RIVKIN RADLER LLP

Frank P. Tiscione



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cc: Barry I. Levy, Esq.
All counsel via ECF